

A-84-082

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FILE NUMBER
APR 9 10 36 AM '84

April 5, 1984

Janis Shank McLean, Esq.
Legal Division
Fair Political Practices Commission
Post Office Box 807
Sacramento, CA 95804

Re: Valuation of Non-Campaign Fundraising
Tickets Provided to Public Officials

Dear Ms. McLean:

Pursuant to our phone conversation of April 4, 1984, I wish to restate the advice you gave me.

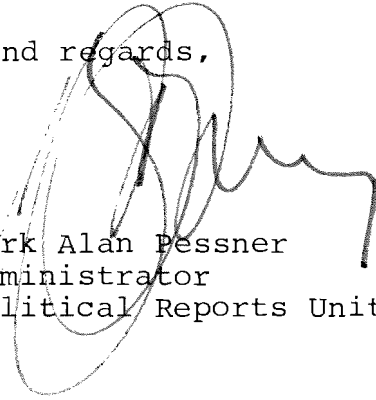
I described a situation in which Corporation A has purchased a table of tickets to a non-campaign fundraising event. Examples would be YMCA Man of the Year Dinner, California Journal/Coro Foundation California Roast. Public Official B has been invited as the guest of Corporation A to that event. The question is whether or not Corporation A has made a gift to Public Official B.

You advised me that it is the opinion of the FPFC Staff that the value of the ticket to a non-campaign fundraiser is not the donation price, but the actual cost of the meal or beverages consumed. Therefore, if Corporation A invites Public Official B to sit at its table at an event, a gift, as defined in Government Code Section 82028, has been made by Corporation A and accepted by Public Official B of the actual value received and therefore Public Official B has reporting responsibilities under Government Code Section 87207(a)(1) by reason of his attendance at the event, if that gift and others provided by Corporation A amount to \$50 or more in a calendar year.

Janis Shank McLean, Esq.
April 5, 1984
Page two

Please confirm our conversation by signing the attached letter copy and returning it to me. If I have misstated any part of our conversation, please advise me at your earliest convenience.

Kind regards,



Kirk Alan Pessner
Administrator
Political Reports Unit

KAP:ddl
Attachment

Confirmed by:

JANIS SHANK MCLEAN, ESQ.